

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

W.A. DREW EDMONDSON, in his capacity as)	
ATTORNEY GENERAL OF THE STATE OF)	
OKLAHOMA, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 05-CV-329-TCK-SAJ
)	
TYSON FOODS, INC., et al.,)	
)	
Defendants,)	
)	
TYSON FOODS, INC., et al.,)	
)	
Third-Party Plaintiffs,)	
)	
v.)	
)	
CITY OF TAHLEQUAH, et al.,)	
)	
Third-Party Defendants.)	

**UNOPPOSED MOTION BY THE ILLINOIS RIVER RANCH RECREATIONAL
VEHICLE PARK PROPERTY OWNERS ASSOCIATION FOR ENLARGEMENT OF
TIME TO RESPOND TO THIRD-PARTY COMPLAINT**

Pursuant to Fed.R.Civ.P. 7(b) and Local Civil Rule 7.1(g), the Illinois River Ranch Recreational Vehicle Park Property Owners Association, Third-Party Defendant No. 36, requests that this Court issue an Order granting it an enlargement of time during which they must respond to the Third-Party Complaint (Dkt. #80), and states as follows:

1. The Illinois River Ranch Recreational Vehicle Park Property Owners Association is recently added member of a group of Third-Party Defendants which is represented by the same attorneys and which is being called "The Berry Group." The Illinois River Ranch Recreational Vehicle Park Property Owners Association received suit papers on or about March 26, 2006. The

earliest day by which it would be currently required to respond to the Third-Party Complaint is April 15, 2006.

2. Counsel for The Berry Group has conferred with designated counsel for the Third-Party Plaintiffs, who has authorized moving counsel to advise the Court that the Third-Party Plaintiffs do not object to the relief requested herein.

3. In the interest of coordination and efficiency among all parties and judicial economy, the Illinois River Ranch Recreational Vehicle Park Property Owners Association requests that the deadline for it to respond to Third-Party Complaint be extended until May 8, 2006.

4. This is the first request for an extension of time sought by the Illinois River Ranch Recreational Vehicle Park Property Owners Association, and it is sought in good faith and not for the purpose of delay. Counsel for The Berry Group need additional time within which to complete their review and investigation of Third-Party Plaintiffs' claims, to confer with client representatives, and to prepare and file appropriate responses. Members of the Berry Group reserve all defenses, including any deficiencies in the service of process.

5. This action is not presently set for trial and therefore granting this Motion will not delay or adversely affect any trial date.

WHEREFORE, the Illinois River Ranch Recreational Vehicle Park Property Owners Association requests that this Court allow them until May 8, 2006 to file its responsive pleadings to the Third-Party Complaint.

Respectfully submitted,

s/R. Jack Freeman

R. Jack Freeman

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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2006, I electronically transmitted a copy of the forgoing Unopposed Motion By the Illinois River Ranch Recreational Vehicle Park Property Owners Association for Enlargement of Time to Respond to Third-Party Complaint to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Jo Nan Allen
Frederick C Baker
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Vicki Bronson
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Ronnie Jack Freeman
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Robert W George
Tony M. Graham
James Martin Graves
Thomas James Grever
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John Trevor Hammons
Michael Todd Hembree
Theresa Noble Hill

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Raymond Thomas Lay
Nicole Marie Longwell

Timothy K Webster
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Terry Wayen West
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I hereby certify that on April 12, 2006, I served the same document by U.S. Postal Service on the following who are not registered participants of the ECF System:

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Date: April 12, 2006

s/R. Jack Freeman
R. Jack Freeman